



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: ECL-111

November 2, 2005

James M. Anderson, Manager
Oregon Department of Environmental Quality
Northwest Region Portland Office
Portland Harbor Section
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

RE: Revised Source Control Decision
Calbag Metals,
4927 NW Front Avenue, Portland, Oregon
ECSI No. 2454

Dear Mr. Anderson:

EPA Region 10 has reviewed DEQ's revised Source Control Decision (SCD) for the Calbag Metals site. EPA agrees that Calbag has effectively controlled sources of contaminants that would remove this site from a high priority listing under the PH JSCS; however, there may be a need for further source control actions at this site in the future to ensure that the Portland Harbor Superfund Site (PHSS) is not recontaminated from pollutants discharged to the Willamette River from this upland site. If DEQ goes forward with a "no further action" letter, EPA may still require further source control actions under CERCLA.

EPA is concerned about the high metals values from post-source control monitoring, and missing information or unsupported statements within the SCD. The following describes some of the information EPA believes is either missing from or unsupported in the SCD.

First, there are still metals values in the water column of this discharge that exceed Portland Harbor SLVs. EPA cannot determine the methods used to remove sediments from the storm water lines and there could be residual sediments that could cause high metals values to persist in the discharge. As recognized by our JSCS, the exceedance of an SLV itself does not constitute a need for further source control. However, if it is found that the levels discharged pose unacceptable risk to the PHSS, further source control may be required.

Secondly, after the storm water lines were cleaned and the site was repaved, sampling of COIs in storm water sediments being discharged has not been conducted and several parameters of concern were not sampled in either media (water or sediment) of the storm water discharge (e.g., PCBs, phthalates, nickel, mercury). There is no clear indication between pre- and post-storm water line cleaning and paving that COIs have been reduced to levels that would not pose a risk to the PHSS.

Lastly, the SCD states that there is “no significant release” of contaminants (e.g., petroleum, metals, PCBs) from the decommissioned USTs on site, yet it is also stated that groundwater is an unlikely migration pathway because the site is 1,000 feet from the river. The SCD did not provide any information about where samples were collected, data regarding the levels of contaminants monitored in the subsurface soils, and it did not provide any supporting justification for excluding the groundwater pathway other than the proximity to the river.

Based upon the information contained in the SCD, EPA believes that storm water monitoring for this site must be conducted to obtain the mass loading rate of chemicals of concern and volume discharged during significant storm events. Therefore, all media (e.g., water and sediments) of the storm water discharge from this site should be monitored during at least five storm events greater than 0.1 inch rainfall preceded by at least 72 hours of dry weather. Additionally, samples should be collected in-line as a flow-proportioned composite and analyzed for copper, lead, nickel, mercury, zinc, PCBs and phthalates using analytical methods that quantitate the rate of discharge (e.g., grams per day).

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine Koch, Remedial Project Manager
U.S. EPA